

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

UNITED STATES OF AMERICA §  
§  
v. § Case No.: 4:16-CR-00131-O  
§  
MANDY MARIE TURNER (03) §

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINES  
SENTENCING MEMORANDUMS AND DEPARTURE MOTIONS**

TO THE HONORABLE REED O'CONNER,  
UNITED STATES DISTRICT COURT JUDGE  
FOR THE NORTHERN DISTRICT OF TEXAS:

COMES NOW, the Defendant, Mandy Turner, through counsel of record, and files her Unopposed Motion to Extend Deadlines for Sentencing Memorandums and Departure Motions, and, in support thereof, would respectfully show the Court the following:

I.

Pursuant to this Court's Order, the current deadline for departure motions and sentencing memorandums is August 25, 2016.

II.

Defendant needs an extension because we are still working to develop mitigation materials in this case which we expect should be resolved by the end of next week. Defendant in this case has provided substantial assistance to the government and agents in this conspiracy. Her cooperation is instrumental in the prosecution of other co-defendants. Trial for co-defendants in this conspiracy was unexpectedly re-scheduled from Monday, August 22, 2016, to Monday, August 29,

2016. Defendant is listed as a witness in the trial next week and she is a witness against more than one defendant in said trial. It is impossible for the government to evaluate the merits of filing a motion for downward departure until defendant testifies.

Defendant requests that any deadlines for Motions for Departure and Sentencing Memorandums be extended in order for defendant to continue in her cooperation with this case and receive maximum benefit for her assistance to the government should they be inclined to file motions for downward departure.

### III.

Defendant respectfully requests that this Court grant an extension of at least two weeks. Defense Counsel spoke with AUSA Shawn Smith and he is unopposed to this motion.

Respectfully submitted,

/s/ Kara L. Carreras

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### CERTIFICATE OF CONFERENCE

On August 24, 2016, Counsel certifies that she spoke with Assistant United States Attorney, Shawn Smith, by telephone and he is not opposed to the granting of this motion.

/s/Kara L. Carreras//

Kara L. Carreras

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion was electronically filed with the clerk of Court for the United States District Court, Northern District and notice provided to Assistant United States Attorney, Shawn Smith, via email on August 24, 2016.

/s/Kara L. Carreras//  
Kara L. Carreras